

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:	§	Chapter 11
RHODIUM ENCORE LLC, <i>et al.</i> , ¹	§	Case No. 24-90448 (ARP)
Debtors.	§	(Jointly Administration Pending)
	§	
	§	
	§	

**NOTICE OF APPEARANCE AND REQUEST
FOR SERVICE OF NOTICES AND DOCUMENTS**

PLEASE TAKE NOTICE that the undersigned appears as counsel to Galaxy Digital, LLC, in its capacity as DIP Agent² under the proposed DIP Facility,³ for itself and on behalf of the DIP Lenders thereunder (together with the DIP Agent, the “***DIP Secured Parties***”) in the above-captioned cases, pursuant to section 1109(b) of title 11 of the United States Code (the “***Bankruptcy Code***”) and Rules 2002, 3017, 9007, and 9010 of the Federal Rules of Bankruptcy Procedure (the “***Bankruptcy Rules***”), and requests that all notices given or required to be given in these cases, including any adversary proceeding related to these cases involving the DIP Secured Parties, be given and served upon:

¹ The Debtors in these chapter 11 cases and the last four digits of their corporate identification numbers are as follows: Rhodium Encore LLC (3974), Jordan HPC LLC (3683), Rhodium JV LLC (5323), Rhodium 2.0 LLC (1013), Rhodium 10MW LLC (4142), Rhodium 30MW LLC (0263), Rhodium Enterprises, Inc. (6290), Rhodium Technologies LLC (3973), Rhodium Renewables LLC (0748), Air HPC LLC (0387), Rhodium Shared Services LLC (5868), Rhodium Ready Ventures LLC (8618), Rhodium Industries LLC (4771), Rhodium Encore Sub LLC (1064), Jordan HPC Sub LLC (0463), Rhodium 2.0 Sub LLC (5319), Rhodium 10MW Sub LLC (3827), Rhodium 30MW Sub LLC (4386), and Rhodium Renewables Sub LLC (9511). The mailing and service address of the Debtors in these chapter 11 cases is 2617 Bissonnet Street, Suite 234, Houston, TX 77005.

² As defined in the *Emergency Motion of Debtors for Entry of Interim and Final Orders (A) Authorizing the Debtors to Obtain Postpetition Financing, (B) Granting Liens and Providing Claims with Superpriority Administrative Expense Status, (C) Modifying the Automatic Stay, (D) Scheduling a Final Hearing, and (E) Granting Related Relief* (together with the proposed orders and all exhibits annexed thereto, the “***DIP Motion***”).

³ Capitalized terms used but not otherwise defined herein have the meanings given to them in the DIP Motion.

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-and-

Robert Trust (*pro hac vice* pending)
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PLEASE TAKE FURTHER NOTICE that, pursuant to section 1109(b) of the Bankruptcy Code, the foregoing request includes not only the notices and papers referred to in the Bankruptcy Rules specified above, but also includes, without limitation, orders and notices of any application, motion, petition, pleading, request, complaint or demand, whether written or oral, formal or informal, and whether transmitted or conveyed by mail, hand delivery, facsimile transmission, e-mail, telephone, telegraph, telex or otherwise, which affects the above-captioned Debtors (the “*Debtors*”) or the property of or in the possession, custody or control of the Debtors or which is otherwise filed or given with regard to the above-referenced cases.

PLEASE TAKE FURTHER NOTICE that neither this Notice of Appearance and Request for Service of Notices and Documents nor any later appearance, pleading, claim, or suit shall waive any right (1) to have final orders in non-core matters entered only after *de novo* review by a District

Judge, (2) to trial by jury in any proceeding so triable in these cases or any case, controversy, or proceeding related to these cases, (3) to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal, (4) to contest jurisdiction or venue in these cases or in any case, controversy, or proceeding related to these cases, or (5) to have documents served in accordance with Bankruptcy Rule 7004 and Rule 4 of the Federal Rules of Civil Procedure.

PLEASE TAKE FURTHER NOTICE that this Notice of Appearance and Request for Service of Notices and Documents is without prejudice to the Secured Parties' rights, remedies, claims, actions, defenses, setoffs, or recoupments, in law or in equity, against the Debtors and any other entities either in these cases or in any other action, all of which rights, remedies, claims, actions, defenses, setoffs and recoupments are expressly reserved.

PLEASE TAKE FURTHER NOTICE that pursuant to Bankruptcy Rule 3017(a), the Secured Parties further request that all plans and disclosure statements, including amendments and supplements thereto, filed in these cases by any party be duly served upon the Secured Parties' undersigned counsel.

PLEASE TAKE FURTHER NOTICE that the undersigned hereby requests that the names and addresses set forth herein be added to the mailing matrix in these cases.

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Dated: August 29, 2024

Respectfully submitted,

By: /s/ Ryan C. Wooten

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*Counsel for the DIP Agent, for itself and on behalf of the
DIP Lenders*

CERTIFICATE OF SERVICE

This will certify that a true and correct copy of the foregoing document was forwarded by electronic transmission to all registered ECF users appearing in these cases on August 29, 2024.

/s/ Ryan C. Wooten
Ryan C. Wooten